To: File
From: John Legg
Date: 08/15/16 and 11/14/16

JC Legg 11/14/16

Subj: Class I Administrative Update to R13-1512I
Rust-Oleum Corporation, LeSage Facility, Cabell County, WV
Permit No.: R13-1512J; Plant ID No.: 011-00045

SUMMARY

On August 11, 2016, Rust-Oleum Corporation (Rust-Oleum) submitted a Class I Administrative Update (R13-1512J) for their Lesage, Cabell County, WV facility to:

1) Install three (3) new 180 gallon Glycol Ether DPM tanks (DT-7, DT-8, and DT-9).

   The combined annual throughput of DT-7 thru DT-9 is estimated to be 34,560 gallons. Current Glycol Ether DPM annual throughput is approximately 21,600 gallons. The proposed change will generate an annual throughput of approximately 56,160 gallons which is well below the currently permitted Glycol Ether DPM throughput of 1,000,000 gallons per year.

   Glycol Ether DPM emissions are estimated to increase by 37 lb/yr (60 lb/yr x 34,560 gal/56,160 gal) as a result of the increase in flow rate.

2) Install six (6) new paint manufacturing vessels: DT-10, DT-11, TD-47, TD-48, TD-308 and TD-309.

   The products associated with these vessels are water-based, contain no hazardous ingredients or regulated air pollutants.

On August 12, 2016, the writer was assigned as the reviewing engineer. A completeness email was issued to the company that same day. It deemed the application complete as of August 11, 2016. The updated permit was due on October 11, 2016. (No legal advertisement was required because the application was deemed to be a class I administrative update.)

PROCESS DISCUSSION

The following information was taken from the cover letter of the permit application:

1) Install three (3) new 180 gallon Glycol Ether DPM tanks: DT-7, DT-8 and DT-9.

   The combined annual throughput of DT-7 and through DT-9 is estimated to be 34,560 gallons. Current Glycol Ether DPM annual throughput is approximately 21,600 gallons. The proposed modification will generate an annual throughput of

approximately 56,160 gallons which is many orders of magnitude below the currently permitted Glycol Ether DPM throughput limit of 1.0 MM gallons per year. The proposed change will not exceed the current permit emission limitations.

2) Install six (6) new paint manufacturing vessels: DT-10, DT-11, TD-47, TD-48, TD-308 and TD-309.

The products associated with the vessels are water-based, contain no hazardous ingredients or regulated air pollutants. The proposed change will not exceed the current permit emission limitations.

Rust-Oleum Paint is requesting that for the above nine (9) tanks/vessels referenced in this Class I Administrative Update plus TD-46 referenced in the Class I Administrative Update letter dated February 11, 2016 to be included in the revised permit (R13-1515J)Table 1.0 Emission Units.

Table 1: Tanks Added to R13-1512J's Emission Units Table. [Nine (9) Tanks/ Vessels from Update R13-1512J Plus (+) One (1) Tank (TD-46) from Update R13-1512I.]

ID No.	Product	Vessel Size (gal)	Estimated Annual Throughput (gal)
DT-7	Glycol Ether DPM	180	11,520
DT-8	Glycol Ether DPM	180	11,520
DT-9	Glycol Ether DPM	180	11,520
DT-10	Seal-Krete Floor Tex Tintable Textured Coating	1,500	64,000
DT-11	Seal-Krete Epoxyl Seal	1,000	50,400
TD-46*	Mixing Tank for OK 811	1,000	
TD-47	Seal-Krete Clear Seal Gloss Sealer	1,000	70,000
TD-48	Seal-Krete Epoxyl Seal	4,000	280,000
TK-308	Pilotec PA-05	5,000	48,000
TK-309	BASF Acronal 296D	7,500	49,000
* Tank TD-46 Previously Permitted under Update R13-1512I Approved April 19, 2016.			

Also, Rust-Oleum Paint is requesting that TD-46 be listed in the Emission Units Table (1.0) for Permit R13-1512J. TD-46 was referenced in the class I administrative update letter dated February 11, 2016. Although this 1,000 gallon water-base paint mixing tank is not an emission

source for any regulated air pollutants, it is Rust-Oleum Paint's preference to have the vessel included in the permit with whatever designation DAQ deems appropriate (such as "Water-Based Paint Only").

CHANGES MADE TO PERMIT R13-1512I

Attachment A to this evaluation contains a word-perfect file comparison comparing the resulting permit (R13-1512J) to permit R13-1512I.

REGULATORY APPLICABILITY

Rust-Oleum's Lesage facility is view as a minor source not subject to Title V. The facility's regulatory applicability did not change as a result of granting this class I administrative update.

Attachment A

File Comparison

Comparing R13-1512J to R13-1512I

WordPerfect Document Compare Summary

Original document: Q:\AIR_QUALITY\J_LEGG\Rust Oleum\R13-1512I\011-00045_PERM_13-1512I.wpd
Revised document: Q:\AIR_QUALITY\J_LEGG\Rust Oleum\R13-1512J\011-00045_PERM_13-1512J.wpd
Deletions are shown with the following attributes and color:
~~Strikeout~~, Blue RGB(0,0,255).
Deleted text is shown as full text.
Insertions are shown with the following attributes and color:
Double Underline, Redline, Red RGB(255,0,0).

The document was marked with 8 Deletions, 10 Insertions, 0 Moves.

West Virginia Department of Environmental Protection
Division of Air Quality

Earl Ray Tomblin
Governor

Randy C. Huffman
Cabinet Secretary

Permit to Update

R13-1512~~I~~J

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45 C.S.R. 13 — Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation. The permittee identified at the facility listed below is authorized to construct the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Issued to:

Rust-Oleum Corporation
LeSage Facility
011-00045

William F. Durham
Director

Issued: ~~April~~November 1~~9~~4, 2016

This permit will supercede and replace Permit R13-1512~~H~~I.

Facility Location:	LeSage, Cabell County, West Virginia
Mailing Address:	7850 Ohio River Rd; Lesage, WV 25537
Facility Description:	Paint Product Blending and Repackaging
NAICS Codes:	325510
UTM Coordinates:	388.1 km Easting • 4,268.4 km Northing • Zone 17
Permit Type:	~~Modification~~Class I Administrative Update
Description of Change:	~~1) Tank TK-12 (Methylene Chloride) was emptied and taken out of service. TK-10 is now the designated tank being used to store Methylene Chloride. The tanks are the same size; emission factors and the process stayed the same. 2) Tank TK-20 (5,000 gallons design capacity) will be used to store Xylene, in addition to Tank TK-29. Twenty thousand gallons per year of Xylene was allowed as the annual throughput for Tank TK-20. The annual Xylene throughput for Tank TK-29 was cut by 20,000 gallons per year to 130,000 gallons per year. Xylene throughput for the tanks is based on information contained in the application's cover letter.~~ Add nine (9) tanks/vessels (DT-7 through DT-11, TD-48, TD-47, TK-308 and TK-309) plus TD-46 referenced in the Class I Administrative Update letter dated Feburary 11, 2016 to the Emission Units in section 1.0 of this permit.

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§ 22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §22-5-14.

The source is not subject to 45CSR30.

1.0 Emission Units

ID. No.	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
TD-35	ST-5	Indoor Mixing Tank		1,400 gal	None
TD-36	ST-3	Indoor Mixing Tank		2,000 gal	None
TD-37	E-TK-2	Indoor Mixing Tank		2,000 gal	Vapor Balance
TD-38	ST-2	Indoor Mixing Tank		1,800 gal	None
TD-39	ST-3	Indoor Mixing Tank		1,800 gal	None
TD-40	ST-3	Indoor Mixing Tank		1,800 gal	None
TD-41	E-TK-2	Indoor Mixing Tank		2,000 gal	Vapor Balance
TD-42	Vents Inside	Indoor Mixing Tank		2,000 gal	None
TD-43	Vents Inside	Indoor Mixing Tank		2,000 gal	None
TD-44	Vents Inside	Indoor Mixing Tank		2,000 gal	None
TD-45	Vents Inside	Indoor Mixing Tank	2014	1,100 gal	None
TD-46	Not Assigned	Mixing Tank for OK 811 (No Emissions/Water Based Paint Only)	2016	1,000 gal	None
TD-47	Not Assigned	Seal-Krete Clear Seal Gloss Sealer (No Emissions/Water Based Paint Only)	2016	1,000 gal	None
TD-48	Not Assigned	Seal-Krete Epoxy Seal (No Emissions/Water Based Paint Only)	2016	4,000 gal	None
TD-308	Not Assigned	Pilotec PA-05 (No Emissions/Water Based Paint Only)	2016	5,000 gal	None
TD-309	Not Assigned	BASF Acronal 296D (No Emissions/Water Based Paint Only)	2016	7,500 gal	None
PDT-1	Vents Inside	Portable Disperser Tank		180 gal	None
PDT-2	Vents Inside	Portable Disperser Tank		180 gal	None
PDT-3	Vents Inside	Portable Disperser Tank		180 gal	None
DT-1	ST-1	Disperser Tank		850 gal	DC-1
DT-2	ST-1	Disperser Tank		850 gal	DC-1
DT-3	ST-1	Disperser Tank		850 gal	DC-1
DT-4	ST-1	Disperser Tank		430 gal	DC-1
DT-5	ST-1	Portable Disperser Tank		430 gal	DC-1
DT-6	ST-1	Portable Disperser Tank		430 gal	DC-1
DT-7	E-DT-7	Glycol Ether DPM	2016	180 gal	None
DT-8	E-DT-8	Glycol Ether DPM	2016	180 gal	None
DT-9	E-DT-9	Glycol Ether DPM	2016	180 gal	None
DT-10	Not Assigned	Seal-Krete Floor Tex Tintable Textured Coating (No Emissions/Water Based Paint Only)	2016	1,500 gal	None

1.0 Emission Units

ID. No.	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
DT-11	Not Assigned	Seal-Krete Epoxy Seal (No Emissions/Water Based Paint Only)	2016	1,000 gal	None
S-1	ST-6	Container Filling Machine		2,160 GPM	None
S-2	ST-6	Container Filling Machine		3,600 GPM	None
S-3	ST-6	Container Filling Machine		2,160 GPM	None
MS-10	Vents Inside	Five Gallon Filling Machine		400 GPM	None
RC-1	ST-6	Container Filling Machine		900 GPM	None
RC-2	ST-6	Container Filling Machine		900 GPM	None
HF-1	Vents Inside	Container Filling Machine (Hand)		400 GPM	None
WP-1	Vents Inside	Container Filling Machine			None
DT-1 thru DT-6	E-ST-1[2]	Combined Stack Vent	1994	1200 CFH	None
B1	E-B1	Burnham, Series 2A Heat Input Boiler	1997	299 MBTU/hr	None
H1-H15	E-H1 - E-H15	DX-HL Series Tube Heaters	1997	0.2 MMBTU/hr	None

NOTE 1: Design capacity of vent (E-TK-1 through E-TK-30) is for filling rate of 100 gpm maximum through a 2 inch filling line from tank truck unload to storage tank and 2" vent return from the storage tank to the tank truck. Each tank has a conservation vent for pressure relief in the event a vapor balance line is plugged. The capacity of each vent at the tank relief pressure can be included if needed however this is a worse case scenario and not a design capacity

NOTE 2: E-ST-1 stack vent has a blower with a 1,200 CFH discharge capacity

2.3. Authority

This permit is issued in accordance with West Virginia Air Pollution Control Law W.Va. Code §§22-5-1 et seq. and the following Legislative Rules promulgated thereunder:

2.3.1. 45CSR13 – *Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation;*

2.3.2. 45CSR19 – *Requirements for Pre-Construction Review, Determination of Emission Offsets for Proposed New or Modified Stationary Sources of Air Pollution and Emission Trading for Intrasource Pollutants.*

2.4. Term and Renewal

2.4.1. This permit supercedes and replaces previously issued Permit R13-1512~~H~~I. This permit shall remain valid, continuous and in effect unless it is revised, suspended, revoked or otherwise changed under an applicable provision of 45CSR13 or any applicable legislative rule.

2.5. Duty to Comply

2.5.1. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit ~~Application~~Applications R13-1512J, R13-1512I, R13-1512H, R13-1512G,R13-1512F,R13-1512E, R13-1512D, R13-1512C, R13-1512B, R13-1512,A, R13-1512 and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to; **[45CSR§§13-5.11 and 13-10.3]**

2.5.2. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA;

2.5.3. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia Code 22-5-6 and 22-5-7;

2.5.4. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses and/or approvals from other agencies; i.e., local, state and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

2.6. Duty to Provide Information

The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for administratively updating, modifying, revoking or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality